

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN : Civil No. 19-2875 (RBK/JS)
PRODUCTS LIABILITY LITIGATION :
: HON. ROBERT B. KUGLER
: HON. JOEL SCHNEIDER
:

DEFENDANTS' LIST OF "MACRO" DISCOVERY ISSUES

Defendants submit the following list of proposed "macro" discovery issue to brief and decide before the December 11, 2019 conference:

1. Foreign regulatory materials and communications;
2. Foreign sales, marketing and agreement information;
3. Finished dose manufacturing process;
4. Limitation of the scope of valsartan testing;
5. Limitation of health risk discovery to injuries alleged in complaints; and
6. Relevant time period for custodial search and production of non-custodial documents.

Dated: October 21, 2019

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg
DUANE MORRIS LLP
30 S. 17th Street
Philadelphia, PA 19103
Tel: 215-979-1175
Fax: 215-689-2198
Email: sagoldberg@duanemorris.com

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2019, a true and correct copy of the foregoing was filed and served upon all counsel of record via the CM/ECF system of the United States District Court for the District of New Jersey.

/s/ Seth A. Goldberg

Seth A. Goldberg